


SEALED
**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**
FILED

June 05, 2024

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXASBY: RR DEPUTY**UNITED STATES OF AMERICA****Plaintiff****v.**

- (1) ANTONIO RIOS JR
aka "TONE"
- (2) DANIEL NATIVIDAD
aka "DANNY BOY"
- (3) BRIAN ZEPEDA
aka "GET DOWN"
- (4) ROBERTO IBARRA
aka "BOBBY"
- (5) VIDAL MORALES JR
aka "MOE"
- (6) MIKE RAYAS CARRILLO
aka "GORDO"
- (7) JESUS MENDOZA JR.
aka "CHIVO"
- (8) GILBERTO GARCIA
aka "GIBO"
- (9) RAMON LOZOYA
aka "BULLDOG"
- (10) RONALD MENDOZA
aka "RONNIE"
- (11) MAXIMO FLORES JR.
- (12) MIGUEL ZAMORA ROSAS
aka "EIGHT BALL"
- (13) PAUL GARCIA
aka "BABY PAUL"
- (14) ABRAHAM PAGAN
aka "SHANK"
- (15) CARLOS BERNAL
aka "GUERO"
- (16) ADRIAN CALVILLO
aka "TOKEN"
- (17) MARK ANTHONY AVILA
- (18) RUDY HUGO LOPEZ
- (19) ROBERT DAVALOS ALVARADO
aka "PORK CHOP"

5:23-CR-00483-DAE**First Superseding Indictment**

COUNT 1: 21 U.S.C. §§ 846, 841(a)(1), &

(b)(1)(A)/(B)

Conspiracy to Possess with Intent to
Distribute Methamphetamine

COUNT 2: 21 U.S.C. §§ 846, 841(a)(1), &

(b)(1)(A)/(B)/(C)

Conspiracy to Possess with Intent to
Distribute Heroin

COUNT 3: 21 U.S.C. §§ 846, 841(a)(1), &

(b)(1)(A)/(B)/(C)

Conspiracy to Possess with Intent to
Distribute Cocaine

COUNT 4: 18 U.S.C. § 924(o)

Conspiracy to Possess Firearms in
Furtherance of Drug Trafficking

COUNT 5: 18 U.S.C. § 933

Conspiracy to Traffic Firearms

COUNTS 6, 7, 15, & 23: 21 U.S.C.
§§ 841(a)(1) & (b)(1)(B)/(C) & 18 U.S.C. § 2
Possession with Intent to Distribute Cocaine;
Aiding and AbettingCOUNTS 8-10, 12, 14, & 22: 21 U.S.C.
§§ 841(a)(1) & (b)(1)(A)/(B)/(C) & 18 U.S.C.
§ 2
Possession with Intent to Distribute Heroin;
Aiding and AbettingCOUNTS 11, 16, 20, & 24: 18 U.S.C.
§ 922(g)(1)

(20) RAYMOND MEDINA aka "CRIME"	Felon in Possession of a Firearm
(21) ROGER HILBURN	COUNTS 13, 18, 19, & 21: 21 U.S.C.
(22) ARMANDO PERALES aka "PITBULL"	§§ 841(a)(1) & (b)(1)(A)/(B) & 18 U.S.C. § 2
(23) RUBEN RIVERA	Possession with Intent to Distribute
(24) JR PERALES	Methamphetamine; Aiding and Abetting
Defendants	COUNT 17: 18 U.S.C. § 924(c) Possession of a Firearm in Furtherance of a Drug Trafficking Crime

THE GRAND JURY CHARGES:

INTRODUCTION

1. The Hermanos de Pistoleros Latinos ("the HPL") is a Mexican American prison gang whose name translates to "Brotherhood of Latin Gunmen." The HPL operates in state and federal prisons across the United States, and are prominent in many Texas communities, including San Antonio and Laredo. The HPL is a criminal organization that is heavily involved in trafficking drugs and firearms.

2. The HPL operates through a hierarchical leadership structure. The leaders of the HPL are known as "llaveros", or key holders, and they direct the gang's operations inside prisons and in the "free world." Other ranking members include "abuelos"—senior members of the gang who occupy important decision-making roles—and "encargados", who oversee HPL gang activity in specific Texas cities. Each city in which the HPL has a presence typically has an "encargado" to direct operations. Ranking gang members are responsible for settling disputes among HPL gang members, including those involving drug debts or violations of gang rules. The "encargados" often task other ranked members with day-to-day gang-related activities and announcements to other HPL gang members in the area. Individual HPL gang members hold varying degrees of

membership depending on the length of time they have been associated with the gang and other factors.

3. The HPL is a criminal organization whose members distribute large quantities of narcotics, including methamphetamine, heroin, and cocaine. The HPL maintains ties with Mexican drug trafficking organizations that import narcotics into the United States from Mexico. These narcotics are distributed by HPL gang members throughout Texas, including in the San Antonio area. Suppliers within the HPL receive kilogram and multi-ounce quantities of narcotics that they distribute to HPL gang members and to other distributors. These gang members and distributors often break down the narcotics into smaller amounts before selling the narcotics to other buyers inside and outside of the HPL. HPL gang members frequently store narcotics in their homes and businesses, using the locations as stash houses to keep and distribute narcotics and drug proceeds.

4. The HPL is also a prison-based drug trafficking and distribution network. HPL gang members soak paper and envelopes with liquid narcotics before mailing the drug-soaked sheets to incarcerated members for sale or for use in prison.

5. To support the HPL, free world gang members are required to pay membership dues every two weeks to the “caja” or box, which is a collection of money used by the HPL. The HPL also collects money by fining members for breaking gang rules. HPL gang members often use proceeds from illegal drug trafficking to acquire firearms and to fund gang-related activities, such as paying membership dues, drug debts, and fines.

6. The money collected from membership dues and fines is used by the HPL to finance the gang’s activities inside and outside the prison system. The HPL uses these funds to finance commissary accounts for incarcerated gang members. When gang members are released from

prison, the HPL uses gang funds to provide these members with money, cellphones, clothing, and other items.

7. The HPL conducts monthly meetings that are mandatory for all HPL gang members in the area. During the meetings, which are typically led by an “encargado”, HPL gang members receive messages and directives from gang leadership, discuss changes in policies, and the status of the gang’s finances.

8. The HPL also sends out monthly reports on the state of the organization to its members. The report, which is compiled by a member in the free world and sent via electronic messaging, provides members with an update about the status of HPL gang members incarcerated in federal and state prisons across the United States. The report also discusses the gang’s finances, including the management of the books and funding by the free world and the status of the accounts of incarcerated members. Finally, the reports put HPL gang members and communities on notice for violations of gang rules. These public admonitions are a form of pressure and discipline to ensure compliance.

9. HPL gang members also possess firearms in furtherance of their drug trafficking activity, and they frequently illegally possess firearms, including pistols and high-capacity rifles. HPL gang members keep and acquire firearms to ensure the protection of their drug trade and protection from rival gang members. To that end, HPL gang members buy, sell, and trade firearms with other HPL gang members, who are often felons prohibited from possessing firearms, and with firearms traffickers from outside of the HPL.

COUNT ONE
[Conspiracy to Possess with Intent to Distribute Methamphetamine]
[21 U.S.C. §§ 846, 841(a)(1), & (b)(1)(A)/(B)]

That from on or about November 2022 and continuing until the date of this indictment, in

the Western and Southern Districts of Texas, Defendants,

(1) ANTONIO RIOS JR. aka "TONE",
 (4) ROBERTO IBARRA aka "BOBBY",
 (6) MIKE RAYAS CARRILLO aka "GORDO",
 (7) JESUS MENDOZA JR. aka "CHIVO",
 (9) RAMON LOZOYA aka "BULLDOG",
 (10) RONALD MENDOZA aka "RONNIE",
 (13) PAUL GARCIA aka "BABY PAUL",
 (14) ABRAHAM PAGAN aka "SHANK",
 (15) CARLOS BERNAL aka "GUERO",
 (16) ADRIAN CALVILLO aka "TOKEN",
 (17) MARK ANTHONY AVILA, and
 (18) RUDY HUGO LOPEZ,

knowingly, intentionally, and unlawfully conspired, combined, confederated, and agreed with others, to commit the following offense against the United States: possession with intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1), & (b)(1)(A)/(B).

QUANTITY OF CONTROLLED SUBSTANCE INVOLVED IN THE CONSPIRACY

The quantity of the mixture or substance containing a controlled substance involved in the conspiracy and attributable to each Defendant as a result of each Defendant's own conduct and as a result of the conduct of other conspirators reasonably foreseeable to each Defendant is as follows:

DEFENDANT	QUANTITY
(1) Antonio Rios Jr. aka "Tone"	500 grams or more of a mixture or substance containing a detectable amount of methamphetamine;
(4) Roberto Ibarra aka "Bobby"	500 grams or more of a mixture or substance containing a detectable amount of methamphetamine;

(6) Mike Rayas Carrillo aka "Gordo"	500 grams or more of a mixture or substance containing a detectable amount of methamphetamine;
(7) Jesus Mendoza Jr. aka "Chivo"	500 grams or more of a mixture or substance containing a detectable amount of methamphetamine;
(9) Ramon Lozoya aka "Bulldog"	500 grams or more of a mixture or substance containing a detectable amount of methamphetamine;
(10) Ronald Mendoza aka "Ronnie"	500 grams or more of a mixture or substance containing a detectable amount of methamphetamine;
(13) Paul Garcia aka "Baby Paul"	50 grams or more of a mixture or substance containing a detectable amount of methamphetamine;
(14) Abraham Pagan aka "Shank"	50 grams or more of a mixture or substance containing a detectable amount of methamphetamine;
(15) Carlos Bernal aka "Guero"	50 grams or more of a mixture or substance containing a detectable amount of methamphetamine;
(16) Adrian Calvillo aka "Token"	50 grams or more of a mixture or substance containing a detectable amount of methamphetamine;
(17) Mark Anthony Avila	500 grams or more of a mixture or substance containing a detectable amount of methamphetamine;
(18) Rudy Hugo Lopez	500 grams or more of a mixture or substance containing a detectable amount of methamphetamine;

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

**[Conspiracy to Possess with Intent to Distribute Heroin]
[21 U.S.C. §§ 846, 841(a)(1), & (b)(1)(A)/(B)/(C)]**

That from on or about November 2022 and continuing until the date of this indictment, in the Western and Southern Districts of Texas, Defendants,

(1) ANTONIO RIOS JR. aka "TONE",
 (4) ROBERTO IBARRA aka "BOBBY",
 (6) MIKE RAYAS CARRILLO aka "GORDO",
 (9) RAMON LOZOYA aka "BULLDOG",
 (12) MIGUEL ZAMORA ROSAS aka "EIGHT BALL",
 (14) ABRAHAM PAGAN aka "SHANK",
 (17) MARK ANTHONY AVILA,
 (21) ROGER HILBURN, and
 (22) ARMANDO PERALES aka "PITBULL",

knowingly, intentionally, and unlawfully conspired, combined, confederated, and agreed with others, to commit the following offense against the United States: possession with intent to distribute a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1), & (b)(1)(A)/(B)/(C).

QUANTITY OF CONTROLLED SUBSTANCE INVOLVED IN THE CONSPIRACY

The quantity of the mixture or substance containing a controlled substance involved in the conspiracy and attributable to each Defendant as a result of each Defendant's own conduct and as a result of the conduct of other conspirators reasonably foreseeable to each Defendant is as follows:

DEFENDANT	QUANTITY
(1) Antonio Rios Jr. aka "Tone"	1 kilogram or more of a mixture or substance containing a detectable amount of heroin;
(4) Roberto Ibarra aka "Bobby"	1 kilogram or more of a mixture or substance containing a detectable amount of heroin;

(6) Mike Rayas Carrillo aka "Gordo"	1 kilogram or more of a mixture or substance containing a detectable amount of heroin;
(9) Ramon Lozoya aka "Bulldog"	100 grams or more of a mixture or substance containing a detectable amount of heroin;
(12) Miguel Zamora Rosas aka "Eight Ball"	100 grams or more of a mixture or substance containing a detectable amount of heroin;
(14) Abraham Pagan aka "Shank"	A mixture or substance containing a detectable amount of heroin;
(17) Mark Anthony Avila	100 grams or more of a mixture or substance containing a detectable amount of heroin;
(21) Roger Hilburn	1 kilogram or more of a mixture or substance containing a detectable amount of heroin;
(22) Armando Perales aka "Pitbull"	A mixture or substance containing a detectable amount of heroin;

All in violation of Title 21, United States Code, Section 846.

COUNT THREE
[Conspiracy to Possess with Intent to Distribute Cocaine]
[21 U.S.C. §§ 846, 841(a)(1), & (b)(1)(A)/(B)/(C)]

That from on or about November 2022 and continuing until the date of this indictment, in the Western and Southern Districts of Texas, Defendants,

- (1) ANTONIO RIOS JR. aka "TONE",
- (2) DANIEL NATIVIDAD aka "DANNY BOY",
- (3) BRIAN ZEPEDA aka "GET DOWN",
- (4) ROBERTO IBARRA aka "BOBBY",
- (5) VIDAL MORALES JR. aka "MOE"
- (6) MIKE RAYAS CARRILLO aka "GORDO",
- (7) JESUS MENDOZA JR. aka "CHIVO",
- (8) GILBERTO GARCIA aka "GIBO",

**(11) MAXIMO FLORES JR.,
 (12) MIGUEL ZAMORA ROSAS aka “EIGHT BALL”,
 (13) PAUL GARCIA aka “BABY PAUL”,
 (19) ROBERT DAVALOS ALVARADO aka “PORK CHOP”,
 (20) RAYMOND MEDINA aka “CRIME”,
 (21) ROGER HILBURN, and
 (24) JR PERALES,**

knowingly, intentionally, and unlawfully conspired, combined, confederated, and agreed with others, to commit the following offense against the United States: possession with intent to distribute a mixture or substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1), & (b)(1)(A)/(B)/(C).

QUANTITY OF CONTROLLED SUBSTANCE INVOLVED IN THE CONSPIRACY

The quantity of the mixture or substance containing a controlled substance involved in the conspiracy and attributable to each Defendant as a result of each Defendant's own conduct and as a result of the conduct of other conspirators reasonably foreseeable to each Defendant is as follows:

DEFENDANT	QUANTITY
(1) Antonio Rios Jr. aka “Tone”	500 grams or more of a mixture or substance containing a detectable amount of cocaine;
(2) Daniel Natividad aka “Danny Boy”	500 grams or more of a mixture or substance containing a detectable amount of cocaine;
(3) Brian Zepeda aka “Get Down”	5 kilograms or more of a mixture or substance containing a detectable amount of cocaine;
(4) Roberto Ibarra aka “Bobby”	500 grams or more of a mixture or substance containing a detectable amount of cocaine;

(5) Vidal Morales Jr. aka "Moe"	500 grams or more of a mixture or substance containing a detectable amount of cocaine;
(6) Mike Rayas Carrillo aka "Gordo"	500 grams or more of a mixture or substance containing a detectable amount of cocaine;
(7) Jesus Mendoza Jr. aka "Chivo"	500 grams or more of a mixture or substance containing a detectable amount of cocaine;
(8) Gilberto Garcia aka "Gibo"	500 grams or more of a mixture or substance containing a detectable amount of cocaine;
(11) Maximo Flores Jr.	500 grams or more of a mixture or substance containing a detectable amount of cocaine;
(12) Miguel Zamora Rosas aka "Eight Ball"	A mixture or substance containing a detectable amount of cocaine;
(13) Paul Garcia aka "Baby Paul"	A mixture or substance containing a detectable amount of cocaine;
(19) Robert Davalos Alvarado aka "Pork Chop"	A mixture or substance containing a detectable amount of cocaine;
(20) Raymond Medina aka "Crime"	A mixture or substance containing a detectable amount of cocaine;
(21) Roger Hilburn	A mixture or substance containing a detectable amount of cocaine;
(24) JR Perales	A mixture or substance containing a detectable amount of cocaine;

All in violation of Title 21, United States Code, Section 846.

COUNT FOUR

Conspiracy to Possess Firearms in Furtherance of Drug Trafficking
[18 U.S.C. § 924(o)]

That from on or about November 2022 and continuing until the date of this indictment, in the Western District of Texas, Defendants,

- (1) ANTONIO RIOS JR. aka "TONE",
- (2) DANIEL NATIVIDAD aka "DANNY BOY",
- (3) BRIAN ZEPEDA aka "GET DOWN",
- (6) MIKE RAYAS CARRILLO aka "GORDO",
- (12) MIGUEL ZAMORA ROSAS aka "EIGHT BALL",
- (21) ROGER HILBURN, and
- (24) JR PERALES,

knowingly combined, conspired, and agreed with others to possess firearms in furtherance of the drug trafficking crimes charged in Counts One, Two and Three of this Indictment, in violation of Title 18, United States Code, Section 924(o).

COUNT FIVE

Conspiracy to Traffic Firearms
[18 U.S.C. § 933(a)(3)]

That from on or about November 2022 and continuing until the date of this indictment, in the Western District of Texas, Defendants,

- (1) ANTONIO RIOS JR. aka "TONE",
- (2) DANIEL NATIVIDAD aka "DANNY BOY",
- (3) BRIAN ZEPEDA aka "GET DOWN",
- (6) MIKE RAYAS CARRILLO aka "GORDO",
- (11) MAXIMO FLORES JR.,
- (12) MIGUEL ZAMORA ROSAS aka "EIGHT BALL",
- (21) ROGER HILBURN,
- (23) RUBEN RIVERA, and
- (24) JR PERALES,

knowingly conspired to ship, transport, transfer, cause to be transported, and otherwise dispose of any firearm to another person in and affecting interstate and foreign commerce, knowing and having reasonable cause to believe that the use, carrying, or possession of the firearm by the

recipient would constitute a felony, that is, Conspiracy to Possess Firearms in Furtherance of a Drug Trafficking Crime and Felon in Possession of a Firearm, in violation of Title 18, United States Code, Section 933(a)(3).

COUNT SIX
Possession with Intent to Distribute Cocaine
[21 U.S.C. §§ 841(a)(1) & (b)(1)(C)]

That on or about November 29, 2022, in the Western District of Texas, Defendant,

(20) RAYMOND MEDINA aka “CRIME”,

knowingly, intentionally, and unlawfully possessed with intent to distribute a controlled substance, which offense involved a mixture or substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) & (b)(1)(C).

COUNT SEVEN
Possession with Intent to Distribute Cocaine
[21 U.S.C. §§ 841(a)(1) & (b)(1)(C)]

That on or about December 15, 2022, in the Western District of Texas, Defendant,

(1) ANTONIO RIOS JR. aka “TONE”, and
(20) RAYMOND MEDINA aka “CRIME”,

knowingly, intentionally, and unlawfully possessed with intent to distribute a controlled substance, which offense involved a mixture or substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) & (b)(1)(C).

COUNT EIGHT
Possession with Intent to Distribute Heroin
[21 U.S.C. §§ 841(a)(1) & (b)(1)(B)]

That on or about February 15, 2023, in the Western District of Texas, Defendant,

(1) ANTONIO RIOS JR. aka “TONE”,

knowingly, intentionally, and unlawfully possessed with intent to distribute a controlled substance, which offense involved 100 grams or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) & (b)(1)(B).

COUNT NINE
Possession with Intent to Distribute Heroin
[21 U.S.C. §§ 841(a)(1) & (b)(1)(B)]

That on or about March 14, 2023, in the Western District of Texas, Defendant,

(1) ANTONIO RIOS JR. aka "TONE",

knowingly, intentionally, and unlawfully possessed with intent to distribute a controlled substance, which offense involved 100 grams or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) & (b)(1)(B).

COUNT TEN
Possession with Intent to Distribute Heroin
[21 U.S.C. §§ 841(a)(1) & (b)(1)(B)]

That on or about April 17, 2023, in the Western District of Texas, Defendant,

(1) ANTONIO RIOS JR. aka "TONE",

knowingly, intentionally, and unlawfully possessed with intent to distribute a controlled substance, which offense involved 100 grams or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) & (b)(1)(B).

COUNT ELEVEN
Felon in Possession of a Firearm
[18 U.S.C. § 922(g)(1)]

That on or about April 17, 2023, in the Western District of Texas, Defendant,

(1) ANTONIO RIOS JR. aka “TONE”,

knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm, that is, a Taurus, model 605 revolver, .357 magnum caliber, serial number LN52672, and said firearm had been shipped and transported in interstate and foreign commerce, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT TWELVE

Possession with Intent to Distribute Heroin
[21 U.S.C. §§ 841(a)(1) & (b)(1)(B)]

That on or about May 2, 2023, in the Western District of Texas, Defendant,

(1) ANTONIO RIOS JR. aka “TONE”,

knowingly, intentionally, and unlawfully possessed with intent to distribute a controlled substance, which offense involved 100 grams or more of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) & (b)(1)(B).

COUNT THIRTEEN

Possession with Intent to Distribute Methamphetamine
[21 U.S.C. §§ 841(a)(1) & (b)(1)(A)]

That on or about May 3, 2023, in the Western District of Texas, Defendant,

(16) ADRIAN CALVILLO aka “TOKEN”,

knowingly, intentionally, and unlawfully possessed with intent to distribute a controlled substance, which offense involved 50 grams or more of methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) & (b)(1)(A).

COUNT FOURTEEN

Possession with Intent to Distribute Heroin
[21 U.S.C. §§ 841(a)(1) & (b)(1)(A) & 18 U.S.C. § 2]

That on or about June 22, 2023, in the Western District of Texas, Defendants,

**(1) ANTONIO RIOS JR. aka “TONE”, and
(21) ROGER HILBURN,**

aided and abetted by each other, and others, knowingly, intentionally, and unlawfully possessed with intent to distribute a controlled substance, which offense involved 1 kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) & (b)(1)(A), and Title 18, United States Code, Section 2.

COUNT FIFTEEN
Possession with Intent to Distribute Cocaine
[21 U.S.C. §§ 841(a)(1) & (b)(1)(C) & 18 U.S.C. § 2]

That on or about June 22, 2023, in the Western District of Texas, Defendants,

**(1) ANTONIO RIOS JR. aka “TONE”, and
(21) ROGER HILBURN,**

aided and abetted by each other, and others, knowingly, intentionally, and unlawfully possessed with intent to distribute a controlled substance, which offense involved a mixture or substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) & (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT SIXTEEN
Felon in Possession of a Firearm
[18 U.S.C. § 922(g)(1)]

That on or about June 22, 2023, in the Western District of Texas, Defendant,

(1) ANTONIO RIOS JR. aka “TONE”,

knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed at least one firearm, that is: a Sig Sauer, model P365, 9mm caliber pistol, serial number 66F356844; a Sig Sauer, model P365, 9mm caliber pistol, serial

number 66B564013; a Kimber, model compact CDPII, .45 caliber pistol, serial number KC29213; a Smith & Wesson, model SW40VE, .40 caliber pistol, serial number DYH1245; and an Anderson Manufacturing, model AM-15, .556 caliber rifle, serial number 19267189, and said firearm had been shipped and transported in interstate and foreign commerce, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT SEVENTEEN
Possession of a Firearm in Furtherance of a Drug Trafficking Crime
[18 U.S.C. § 924(c)]

That on or about June 22, 2023, in the Western District of Texas, Defendant,

(1) ANTONIO RIOS JR. aka “TONE”,

did knowingly use and carry at least one firearm, that is: a Sig Sauer, model P365, 9mm caliber pistol, serial number 66F356844; a Sig Sauer, model P365, 9mm caliber pistol, serial number 66B564013; a Kimber, model compact CDPII, .45 caliber pistol, serial number KC29213; a Smith & Wesson, model SW40VE, .40 caliber pistol, serial number DYH1245; and an Anderson Manufacturing, model AM-15, .556 caliber rifle, serial number 19267189, during and in relation to, and did possess said firearm in furtherance of, a drug trafficking crime that may be prosecuted in a court of the United States, that is Conspiracy to Possess with Intent to Distribute Heroin, in violation of Title 21, United States Code, Sections 846, 841(a)(1), & 841(b)(1)(A), as further described in Count Two, Conspiracy to Possess with Intent to Distribute Cocaine, in violation of Title 21, United States Code, Sections 841(a)(1) & (b)(1)(B), as further described in Count Two, and Possession with Intent to Distribute Heroin and Cocaine, in violation of Title 21, United States Code, Sections 841(a)(1) & (b)(1)(A)/(B), as further described in Counts Fourteen and Sixteen, in violation of Title 18, United States Code, Section 924(c).

COUNT EIGHTEEN

**Possession with Intent to Distribute Methamphetamine
[21 U.S.C. §§ 841(a)(1) & (b)(1)(A) & 18 U.S.C. § 2]**

That on or about July 12, 2023, in the Western District of Texas, Defendant,

(6) MIKE RAYAS CARRILLO aka “GORDO”,

aided and abetted by others, knowingly, intentionally, and unlawfully possessed with intent to distribute a controlled substance, which offense involved 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) & (b)(1)(A), and Title 18, United States Code, Section 2.

COUNT NINETEEN

**Possession with Intent to Distribute Methamphetamine
[21 U.S.C. §§ 841(a)(1) & (b)(1)(B)]**

That on or about August 1, 2023, in the Western District of Texas, Defendant,

(15) CARLOS BERNAL aka “GUERO”,

knowingly, intentionally, and unlawfully possessed with intent to distribute a controlled substance, which offense involved 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) & (b)(1)(B).

COUNT TWENTY

**Felon in Possession of a Firearm
[18 U.S.C. § 922(g)(1)]**

That on or about September 2, 2023, in the Western District of Texas, Defendant,

**(1) ANTONIO RIOS JR. aka “TONE”, and
(23) RUBEN RIVERA,**

knowing they had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed at least one firearm, that is, a Kel-Tec, model Sub-2000,

9mm pistol carbine, serial number FF2723, and an Adams Arms, model AA-15, 5.56mm caliber rifle, serial number AATM018085, and said firearm had been shipped and transported in interstate and foreign commerce, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT TWENTY-ONE

**Possession with Intent to Distribute Methamphetamine
[21 U.S.C. §§ 841(a)(1) & (b)(1)(A) & 18 U.S.C. § 2]**

That on or about November 28, 2023, in the Western District of Texas, Defendants,

**(6) MIKE RAYAS CARRILLO aka “GORDO”,
(7) JESUS MENDOZA JR. aka “CHIVO”, and
(18) RUDY HUGO LOPEZ,**

aided and abetted by each other, and others, knowingly, intentionally, and unlawfully possessed with intent to distribute a controlled substance, which offense involved 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) & (b)(1)(A) and Title 18, United States Code, Section 2.

COUNT TWENTY-TWO

**Possession with Intent to Distribute Heroin
[21 U.S.C. §§ 841(a)(1) & (b)(1)(C) & 18 U.S.C. § 2]**

That on or about December 1, 2023, in the Western District of Texas, Defendants,

**(6) MIKE RAYAS CARRILLO aka “GORDO”, and
(14) ABRAHAM PAGAN aka “SHANK”,**

aided and abetted by each other, knowingly, intentionally, and unlawfully possessed with intent to distribute a controlled substance, which offense involved a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) & (b)(1)(C) and Title 18, United States Code, Section 2.

COUNT TWENTY-THREE
[Possession with Intent to Distribute Cocaine]
[21 U.S.C. §§ 841(a)(1) & (b)(1)(B)]

That on or about December 6, 2023, in the Western District of Texas, Defendant,

(2) DANIEL NATIVIDAD aka “DANNY BOY”,
(6) MIKE RAYAS CARRILLO aka “GORDO”, and
(7) JESUS MENDOZA JR. aka “CHIVO”,

aided and abetted by each other, and others, knowingly, intentionally, and unlawfully possessed with intent to distribute a controlled substance, which offense involved 500 grams or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) & (b)(1)(B).

COUNT TWENTY-FOUR
Felon in Possession of a Firearm
[18 U.S.C. § 922(g)(1)]

That on or about January 22, 2024, in the Western District of Texas, Defendant,

(22) ARMANDO PERALES aka “PITBULL”,

knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm, that is, an FN Firearms, model FNS-40, .40 S&W caliber pistol, serial number GKU0101344, and said firearm had been shipped and transported in interstate and foreign commerce, in violation of Title 18, United States Code, Section 922(g)(1).

NOTICE OF UNITED STATES OF AMERICA’S DEMAND FOR FORFEITURE
[See Fed. R. Crim. P. 32.2]

I.

Drug Violations and Forfeiture Statutes

**[Title 21 U.S.C. §§ 846, 841(a)(1), and (b)(1)(A)/(B)/(C) subject to forfeiture
pursuant to Title 21 U.S.C. § 853(a)(1) and (2)]**

As a result of the criminal violations set forth in Counts One through Three, Six through Ten, and Twelve through Fifteen, Eighteen, Nineteen, and Twenty-One through Twenty-Three the United States gives notice to the Defendants of its intent to seek the forfeiture of the property described below upon conviction and pursuant to Fed. R. Crim. P. 32.2 and Title 21 U.S.C. § 853(a)(1) and (2), which states:

Title 21 U.S.C. § 853. Criminal forfeitures

(a) Property subject to criminal forfeitures.

Any person convicted of a violation of this subchapter or subchapter II punishable by imprisonment for more than one year shall forfeit to the United States, irrespective of any provision of State law.--

- (1) any property constituting, or derived from, any proceeds the person obtained, directly or indirectly, as the result of such violation;
- (2) any of the person's property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation; . . .

II.

Firearm Violations and Forfeiture Statutes

[Title 18 U.S.C. §§ 924(o)/(c), 933(a)(3), and 922(g)(1) subject to forfeiture pursuant to Title 18 U.S.C. § 924(d)(1), made applicable to criminal forfeiture by Title 28 U.S.C. § 2461(c)]

As a result of the criminal violations set forth in Count Four, Five, Eleven, Sixteen, Seventeen, Twenty, and Twenty-Four United States gives notice to Defendants of its intent to seek the forfeiture of the property described below upon conviction and pursuant to Fed. R. Crim. P. 32.2 and Title 18 U.S.C. § 924(d)(1), made applicable to criminal forfeiture by Title 28 U.S.C. § 2461(c), which states:

Title 18 U.S.C. § 924. Penalties

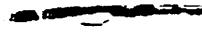
(d)(l) Any firearm or ammunition involved in or used in any knowing violation of subsection . . . (g) . . . of section 922 . . . or knowing violation of section 924 . . . or 933 . . . shall be subject to seizure and forfeiture . . . under the provisions of this chapter. . . .

This Notice of Demand for Forfeiture includes, but is not limited to the following property:

1. Taurus, model 605 revolver, .357 magnum caliber, serial number LN52672;
2. Sig Sauer, model P365, 9mm caliber pistol, serial number 66F356844;
3. Sig Sauer, model P365, 9mm caliber pistol, serial number 66B564013;
4. Kimber, model compact CDPII, .45 caliber pistol, serial number KC29213;

5. Smith & Wesson, model SW40VE, .40 caliber pistol, serial number DYH1245;
6. Anderson Manufacturing, model AM-15, .556 caliber rifle, serial number 19267189;
7. Kel-Tec, model Sub-2000, 9mm pistol carbine, serial number FF2723;
8. Adams Arms, model AA-15, 5.56mm caliber rifle, serial number AATM018085;
9. Smith & Wesson, model FNS-40, .40 S&W caliber pistol, serial number GKU0101344;
10. Any and all other property and/or accessories involved in or used in the commission of the criminal offenses; and
11. Any and all firearms, ammunition, and/or accessories involved in or used in the commission of the criminal offenses.

A TRUE BILL

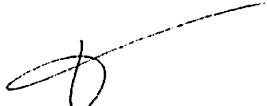
FOREPERSON OF THE GRAND JURY

JAIME ESPARZA
UNITED STATES ATTORNEY

BY:


BRIAN NOWINSKI
Assistant United States Attorney

BY:


FIDEL ESPARZA III
Assistant United States Attorney

